

UNITED STATES DISTRICT COURT

for the
Southern District of OhioFILED
RICHARD V. NAGEL
CLERK OF COURT

2019 JUL 24 AM 10:50

In the Matter of the Search of
USPS Priority Mail parcel 9505 5132 6202 9203 2738 71
addressed to "Tash Rhodd, 4140 Inverrary Dr. Fort
Lauderdale, FL 33319."

Case No.

2:19mj586

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property

USPS Priority Mail parcel 9505 5132 6202 9203 2738 71 addressed to "Tash Rhodd, 4140 Inverrary Dr. Fort Lauderdale, FL 33319."

located in the Southern District of Ohio, Eastern Division, there is now concealed (identify the person or describe the property to be seized):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1) and 843(b).

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Title 21 USC 841(a)(1)

Offense Description

Possession with intent to distribute
a controlled substance

Title 21 USC 843(b)

Prohibited use of a communication center (U.S. Mail)

The application is based on these facts:

As set forth in the attached Affidavit of Postal Inspector MOHAMED A. SABRAH

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Sworn to before me and signed in my presence.

Date:

July 24, 2019

City and state: COLUMBUS, OHIO

Applicant's signature

MOHAMED A. SABRAH, U.S. POSTAL INSPECTOR

Printed name and title

Judge's signature

KIMBERLY A. JOLSON, U.S. MAGISTRATE JUDGE

Printed name and title

7/23/19

K.A.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF THE SEARCH OF)
)
USPS Priority Mail parcel)
9505 5132 6202 9203 2738 71)
addressed to "Tash Rhodd, 4140 Inverrary Dr.)
Fort Lauderdale, FL 33319.")

Case no: **2:19 mj586**
Magistrate Judge
MAGISTRATE JUDGE JOLSON

Affidavit in Support of Application for Search Warrant

I, Mohamed A. Sabrah, Postal Inspector, being duly sworn, depose and state as follows:

1. I have been a U.S. Postal Inspector for the U.S. Postal Inspection Service since February, 2016, enforcing federal mail and drug laws; currently assigned to Columbus, OH. I have received training at U.S. Postal Inspection Service National Training Seminars for mail-related criminal investigations and have investigated cases with other federal, state, and local law enforcement units. I have received an additional 40 hour Prohibited Mailings training by the U.S. Postal Inspection Service
2. The U.S. Postal Inspection Service is aware that drug traffickers have been using Priority Mail, a business-oriented service offered by the U.S. Post Office, to transport controlled substances and transfer funds, cash or otherwise, to further their enterprises. As a result of past investigations and prosecutions, the Postal Inspection Service has determined that a number of indicators can be used to identify packages containing contraband that have been entered into the Priority Mail network. Inspectors routinely review shipment documents and Priority Mail packages originating from or destined to drug source areas, to identify instances where there is a possibility of drug trafficking.
3. On or about July 22, 2019, local law enforcement officers from the Urbana Police Department in Urbana, OH, contacted Postal Inspectors regarding a current investigation they are conducting. Local law enforcement officers notified Inspectors that their target is currently on parole and has previously been sentenced to confinement for drug related crimes. Local law enforcement advised Inspectors that they suspect their target is still conducting drug trafficking actives. Local law enforcement notified Inspectors that they followed their target to the Urbana, OH 43078, post office, and watched him exist his vehicle with a large box and then exit the post office without the large box.
4. On July 22, 2019, Inspectors identified a USPS Priority Mail parcel with tracking number 9505 5132 6202 9203 2738 71, which was believed to contain narcotics due to the above

mentioned information. This parcel is believed to be mailed by the subject of the local law enforcement investigation based on observations made by local law enforcement as mentioned above, and time of mailing.

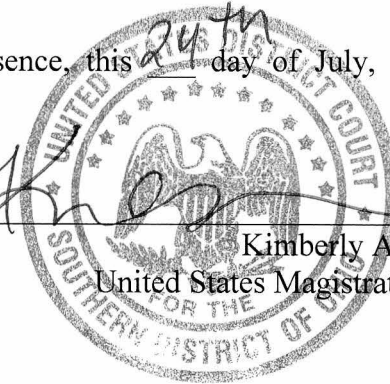

5. On July 22, 2019 Postal Inspectors took custody of USPS Priority Mail parcel with tracking number 9505 5132 6202 9203 2738 71, addressed to "Tash Rhodd, 4140 Inverrary Dr. Fort Lauderdale, FL 33319", and bearing the return address of "Angela Pontil, 323 Powell Ave Urbana, OH 43078." The parcel is a brown Home Depot cardboard box weighing 7 pounds 13 ounces, and was mailed on July 22, 2019 from Urbana, OH 43078 with \$21.70 postage affixed.
6. According to law enforcement databases, the delivery address 4140 Inverrary Dr. Fort Lauderdale, FL 33319 does exist, and Rhodd can be associated to the address.
7. According to law enforcement databases, the return address of 323 Powell Ave Urbana, OH 43078 does exist, but cannot be associated to Pontil. According to local law enforcement, the return address and name are not associated with the mailer of the subject parcel.
8. Your affiant knows that in the past, drug traffickers have used real names at legitimate addresses to receive parcels containing illegal narcotics, and have used non-existent addresses or addresses belonging to others for the sender/return address, in an attempt to legitimize the shipment in the event that the parcel is seized by law enforcement officers.
9. On July 22, 2019, Postal Inspectors contacted Officer David Jones, Columbus Police Department, who is the handler for "Ayoko," a drug detection dog most recently certified by the Ohio Peace Officers Training Council for the detection of marijuana, hashish, cocaine, "crack", heroin, and methamphetamine. K-9 "Ayoko" has had 200 hours of training at Gold Shield Training Kennels, Blacklick, OH, a well-established and regarded training facility for police canines. Both in training and actual deployments, K-9 "Ayoko" has successfully detected narcotics, demonstrating clear, positive, aggressive alerts, and establishing himself as a highly reliable police dog.
10. The subject parcel was hidden among other packages, and "Ayoko" was allowed to search the entire area. Officer Jones concluded that K-9 "Ayoko" did alert positively to U. S. Postal Service Mail parcel bearing label no 9505 5132 6202 9203 2738 71. Based on that alert, Officer Jones concluded that the odor of one of the drugs that K-9 "Ayoko" is trained and certified to detect was present.
11. Based on the information contained herein, your affiant maintains there is probable cause to believe that the USPS Priority Mail parcel bearing tracking number 9505 5132 6202 9203 2738 71 contains controlled substances, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).

12. Based on the facts set forth in this affidavit, I submit that there is probable cause to believe that controlled substances are being concealed in the parcel, and seek the issuance of a warrant to search the parcel for controlled substances to be seized.



Mohamed A. Sabrah
United States Postal Inspector

Sworn to before me, and subscribed in my presence, this 24th day of July, 2019 at Columbus, Ohio.



Kimberly A. Jolson
United States Magistrate Judge